



December 11, 2019

Via ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

U.S. v. Susan Hammatt, 19-Cr-67 (PGG)
Request to Adjourn the December 18, 2019 Status Conference

Honorable Judge Gardephe:

I represent Ms. Susan Hammatt as CJA Counsel in the above-captioned criminal matter. I write this letter with the consent of all parties to request an adjournment of the next status conference on this matter, currently scheduled for December 18, 2019. We are requesting an adjournment of at least 60 days from December 18, 2019. The reasons for this request are: 1) the defense has recently received two additional batches of discovery from the government which the undersigned has had technical difficulties accessing, and for which all counsel have not yet completed review; 2) sadly, Ms. Gallicchio has recently suffered the loss of both parents and, understandably, has been away from work and so will need additional time;¹ and 3) co-defendant Edwin Tanglao has recently suffered a stroke and is in the hospital. As there is a protective order in effect, the time will also be necessary to coordinate meetings, either via video-conference or in person, to review the discovery and discuss the case with our clients, all of whom reside out of state (the Hammatts and Mr. Hoats reside in California and Mr. Tanglao is in an out of state hospital). Should the Court grant this request we consent to the exclusion of time pursuant to the Speedy Trial Act, 18 U.S.C. § 3161.

We thank the Court in advance for its consideration of this matter.

Respectfully,

Judith Vargas

Judith Vargas, Esq.

Attorney for Ms. Susan Hammatt

¹ *We extend our deepest and heartfelt condolences to Ms. Gallicchio during this difficult time.*